

I, Barbara Gleim, declare that the following statements are true to the best of my knowledge and recollection:

1. I am a plaintiff in the above-referenced lawsuit.
2. I live in Cumberland County, Pennsylvania
3. I serve in the Pennsylvania House of Representatives.
4. I have a consistent record of voting to limit the overreach of state government as it relates to the Founding Fathers' intent and meaning within our state constitution.
5. States are sovereign entities, and the sovereignty to make the rules is with The People, specifically delegated in Article 2.
6. Only the Legislative Branch has the authority to make law. The only body The People entrusted the rules to under the Pennsylvania State Constitution is the Legislative Branch. We know that the Judicial Branch interprets the law and the Executive Branch carries out and enforces the law.
7. On September 19, 2023, Governor Shapiro, through a press release, announced that he was changing our voter registration laws by enacting voter registration through the Department of Motor Vehicles.
8. This act through a press release, not only adopted a new rule to the Constitution via the Executive Branch of government, but it compelled the citizens that I represent, "The People," to comply and unilaterally silenced their voice through their local elected representative.
9. Governor Shapiro's "kingly" edict was an abuse of his executive power.
10. This type of rule-making damages the separation of powers, and leaves our great system of government without the necessary checks and balances that were built into our Constitution, which has worked for hundreds of years.
11. Furthermore, as it relates to the President's Executive Order 14019, which overrides laws enacted by The People of Pennsylvania, I am equally injured. The voice of The People, expressed through me as their voice in the Legislature, wished that third-party entities' influence in elections be nullified, yet the President's Order conflicts with that will of The People, and my vote on their behalf. The Executive Branch of federal government should not override state legislatures in matters such as these.
12. I implore the Court to right the wrongs that have been made, and secure the balance of power between the three branches of government, and thus, grant the remedies sought in this lawsuit.

Dated: February 10, 2024


